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11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA
13 FRESNO DIVISION

14 GUADALUPE ESPARZA CARBAJAL,

15 Plaintiff,

16 vs.

17 KILOLO KIJAKAZI, Acting Commissioner of
18 Social Security,

19 Defendant.

Civil No. 1:23-cv-00319-BAM

20
21 STIPULATION AND ~~PROPOSED~~ ORDER
22 FOR EXTENSION OF TIME

23 IT IS HEREBY STIPULATED by and between the parties, through their undersigned
24 attorneys, with this Court's approval, to extend the time by 30 days, from August 30, 2023 to
25 September 29, 2023, for Defendant to file her Cross-Motion for Summary Judgment. All other
26 dates in this Court's Scheduling Order shall be extended accordingly.

27 This is Defendant's first request for an extension of time. Plaintiff's counsel does not
28 oppose the requested extension.

The undersigned counsel for the Commissioner respectfully submits that good cause exists for the requested extension. Due to ongoing staffing fluctuations and organizational changes, the undersigned counsel for the Commissioner has been tasked with additional duties including serving as a jurisdictional coordinator, reviewing other attorneys' work, training new attorneys, and handling more cases, including the above-captioned matter. Counsel for the Commissioner will also be out of the office on pre-planned leave during the last week of August. As a result, and despite diligent efforts to comply with this Court's Scheduling Order, counsel for the Commissioner needs an extension in the instant case to review the administrative record, consider the issues that Plaintiff has raised, confer with her client as necessary, and prepare the Commissioner's Cross-Motion.

Respectfully submitted,

Dated: August 21, 2023

PENA & BROMBERG, PLC

By: /s/ Jonathan O. Pena*
JONATHAN O. PENA
Attorney for Plaintiff
[*as authorized by email on Aug. 21, 2023]

Dated: August 22, 2023

PHILLIP A. TALBERT
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MATHEW W. PILE
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Office of Program Litigation, Office 7

By: /s/ Margaret Branick-Abilla
MARGARET BRANICK-ABILLA
Special Assistant United States Attorney
Attorneys for Defendant

ORDER

Pursuant to the parties' stipulation, and cause appearing, Defendant shall have an extension, up to and including September 29, 2023, to submit her Cross-Motion for Summary Judgment. All other deadlines in the Court's Scheduling Order are modified accordingly.

IT IS SO ORDERED.

Dated: August 22, 2023

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE